

standards at the calciner (in terms of "background" and visibility impacts) and the level percent opacity predicted with the stack(s) from the proposed new incinerator. (Will they meet the State's visibility and opacity standards? How?

Opacity violations at INEEL and Table 4.7-2 This Table which shows criteria pollutant levels in 1995-96 is misleading in that the NWCF calciner was not operating. This table should have new levels of criteria pollutant emissions, especially NOx. This is particularly relevant to this EIS because of the discussion of "background" air quality and visibility sections. Several past public comments have been raised about visibility problems and violations of the State opacity limits at the calciner at INEEL, and DOE should directly address this problem, and incorporate predicted opacity levels from the proposed AMWTP into the final EIS, and simultaneously bring forward design alternatives to solve and monitor these violation problems.

Summary-

The DOE clearly has made a big mistake in this Draft Environmental Impact Statement (DEIS) by neglecting to include appropriate alternatives which could meet RCRA standards and do so in a much cheaper and safer fashion than the preferred alternative in this DEIS. DOE continues to erroneously assume that the WIPP facility is ready to open. The reality must be faced by DOE officials: WIPP may not open in time to "comply" with the Batt Settlement Agreement. Therefore, DOE should attempt to follow a better regulatory driver - the Resource and Conservation, Recovery Act (RCRA). Compliance with RCRA could be met by, first, retrieving the more dangerous buried TRU waste, characterizing it, storing it in above-ground receptacles, or dry-cells. This would have the additional benefit to southern Idahoans, of removing the existing threat of groundwater contamination to the Snake River Plain Aquifer due to buried TRU and TRU mixed-waste - a threat that would continue if the present *preferred alternative* is selected. Concurrent with this project, DOE could more accurately characterize their existing, above-ground TRU waste inventory. With this more accurate accounting of the types of wastes in the INEEL inventory, and with the most dangerous buried waste in a safer position above ground, appropriate treatment decisions and a new EIS process could *then* be made. (As opposed to the existing situation where DOE does not, or cannot, explain the need to incinerate 25% of the TRU waste. Nor does DOE explain why 25,000 cubic meters of the waste scheduled to be treated, does not meet the minimum threshold of TRU waste, and yet is scheduled for expensive treatment and delivery to WIPP, anyway.) The expense of the huge AMWTP project, cannot be justified, given the uncertainties of the WIPP facility, the fact that so much of the TRU waste remains un-characterized and buried, and DOE's avoidance of the more appropriate and, certainly less expensive, RCRA track for retrieval and storage at this juncture.

The additional concerns addressed about air-quality, including the lack of assessments related to formation of secondary aerosols, and the generation of short-term releases from upset/malfunctions of the incinerator, as well as the lack of demonstrated compliance with State opacity standards, are additional reasons for a re-draft of the EIS, with additional alternatives.